

PS Docket No. 11–153: Comment

Introduction

This comment recommends that the Committee encourage development of an interim text-to-911 solution by creating incentives for wireless providers and states, and building regional entities to handle non-voice emergency services media when local PSAPs cannot. Although a text-to-911 solution does not incorporate all three classes of text-capable communications (SMS, IP-based messaging, and RTT), it will serve as a catalyst and facilitator for more comprehensive long-term solutions.

Creating Incentives

Wireless providers generally argue that the Commission should not adopt any text-related requirements for emergency communication with 911 at this time. Accordingly, there appears to be a lack of market incentives. The Commission thus must create incentives—deadlines, timetables, and uniform network interface standard requirements—for providers to rapidly develop NG911 solutions.

Furthermore, because state and regional entities will inevitably play a significant role in deployment of NG911, the FCC must develop an effective dual state-federal regulatory framework. To achieve this, there must be an overhaul of outdated state and federal regulations that hamper deployment of NG911 networks. Following California Technology Agency's Public Safety Communications Office as an example, states should explore state and local barriers to the deployment of NG911 and remove them; the FCC should do the same at the federal level.

With respect to incentivizing states to overhaul outdated regulations, however, the Committee should not deregulate legacy 911 interconnection arrangements and enact liability protection for NG911 service providers. NG911 technology is meant to enhance, not replace, the current E911 system in which voice and TTY-based text are the primary media. Thus, the FCC should continue considering, as factors in hard look review, reasons for enacting current

regulations that, although may hinder the deployment of NG911, are necessary for the current system.

Assessing PSAP NG911 Readiness

With thousands of PSAPs in the U.S. of various sizes and resources, there will most likely be varying timetables for developing technical and operational capability to handle text messages. To facilitate a coordinated approach and accelerate deployment of NG911 services, the Commission should require PSAPs to demonstrate a specified level of technical NG911 capability at the statewide or regional level. The Committee should then impose parallel timetables to achieve NG911 readiness for wireless providers and PSAPs. In doing so, NG911 readiness of either group would not be a source of delay or precondition to subject the other to the Committee's requirements.

Interim Regional Text-to-911 Entities

Meanwhile, the Committee should also adopt AT&T's proposal of building regional entities to handle text-to-911 emergency media when the local PSAPs cannot. Not only will this will prevent further delay in utilizing NG911 technology, but it will also facilitate assessment of NG911 readiness by region. Furthermore, while such entities are handling text messages, PSAPs are given the opportunity to develop and incorporate equipment required to support all non-voice emergency communications to 911, not just text. These regional entities, however, should be limited in number so as to not create disincentives for PSAPs to incorporate NG911 solutions into their own systems.